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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

COMMISSION

In the Matter of )  
 )  
Application by Ameritech Michigan ) CC Docket No. 97-1  
Pursuant to Section 271 of the )  
Telecommunications Act of 1996 to )  
Provide In-Region Inter-LATA )  
Services in Michigan )

COMMENTS OF  
SPRINT COMMUNICATIONS COMPANY, L.P.

Sprint Communications Company, L.P. ("Sprint"), by its attorneys, supports the motion filed by the Association for Local Telecommunications Services ("ALTS") on February 3, 1996.<sup>1</sup> Sprint agrees with ALTS that any purported interconnection agreement between Ameritech and AT&T must be stricken from the record in this Section 271 proceeding. Moreover, should the Commission strike the AT&T Agreement, Sprint respectfully asks that the Commission dismiss summarily Ameritech's Section 271 application since it is, by its own terms, deficient.

BACKGROUND

As noted by ALTS, Ameritech's first Section 271 application was filed on January 2, 1997. That application contained a copy of Ameritech's agreement with AT&T (the "AT&T Agreement"). That AT&T Agreement, stated Ameritech, was "approved by the MPSC [Michigan Public Service Commission] in an order dated November

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<sup>1</sup> See Public Notice, DA 97-242 (Feb. 3, 1997) (permitting comments on ALTS' motion).

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26, 1996." (Ameritech Br. at 20). The AT&T Agreement was essential to Ameritech's Section 271 application because Ameritech asserted that the AT&T Agreement "'includes' and makes available to AT&T each of the checklist items" required by Section 271(c)(2)(B). (Ameritech Br. at 20-21).

Although Ameritech argued that some of its other interconnection agreements -- those with TCG, MFS, and Brooks Fiber -- also met the checklist, that argument was predicated upon the fact that such agreements contain a most-favored nations clause ("MFN") which permits them to borrow missing elements from the AT&T contract. (Ameritech Br. at 21-22 & n.15). Ameritech clarified that point in Schedule 1 of the Affidavit of Gregory Dunny which demonstrates that many checklist items -- such as OSS, unbundled transport, and local and tandem switching -- are not included in the TCG, MFS, or Brooks Fiber agreements except through their MFN provisions in conjunction with the AT&T Agreement.<sup>2</sup>

On January 17, 1997, Ameritech "replaced" its original AT&T Agreement with a new "approved" version which Ameritech had filed at the MPSC on January 16, 1997.<sup>3</sup> In so doing, Ameritech conceded that its original AT&T Agreement had not been approved by the MPSC.<sup>4</sup> Nor, as made clear on the face of the document,

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<sup>2</sup> Schedule 1 to the Dunny Affidavit is attached as exhibit 1 to this filing.

<sup>3</sup> See Ameritech Filing at 1-2, CC Docket No. 97-1 (Jan. 17, 1997).

<sup>4</sup> Id. at 2-3.

had the original AT&T Agreement been signed by AT&T. In light of those problems, Ameritech properly asked the Commission to "restart" the 90 day review process.<sup>5</sup>

Apparently, this second AT&T Agreement is also a nullity. Sprint understands that on January 29, 1997, Ameritech filed a third version of its AT&T Agreement with the MPSC, which has yet to give final approval pursuant to Section 252 to any version of Ameritech's AT&T Agreement. That third version, Ameritech stated, "supercedes all previously filed agreements."<sup>6</sup> In other words, the AT&T Agreement filed on January 29, 1997, is apparently the proper version for both the public's and the Commission's evaluation of Ameritech's Section 271 application. As of this filing, Ameritech has not filed the newest iteration of its AT&T Agreement with the FCC. Thus, neither the public nor the Commission has the document which Ameritech asserts is most relevant to assessing Ameritech's compliance with the competitive checklist of Section 271(c)(2)(B).

#### **DISCUSSION**

The Commission should strike from this record any and all versions of the AT&T Agreement and any reliance on such agreements. As noted, Ameritech, on January 29, 1997, filed a new version of the AT&T Agreement with the MPSC. In so doing, Ameritech stated that the January 29, 1997, agreement

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<sup>5</sup> Id. at 3.

<sup>6</sup> Letter from Edward R. Becker, counsel for Ameritech, to MPSC (Jan. 19, 1997).

"supercedes" all prior agreements. Consequently, the earlier AT&T Agreements -- the only ones which Ameritech has filed in this proceeding -- are of no legal effect.

Should the Commission strike the AT&T Agreement, it must also dismiss summarily Ameritech's Section 271 Application because, without the AT&T Agreement, Ameritech, by its own admission, cannot comply with the competitive checklist of Section 271(c)(2)(B). Ameritech's satisfaction of the checklist is grounded upon its belief that its agreements with TCG, MFS, Brooks Fiber and AT&T satisfy Section 271(c)(2)(B). (Ameritech Br. at 20-21). However, only the AT&T Agreement "includes" all of the checklist items. (Ameritech Br. at 21 & Schedule 1 to Dunny Affidavit). That point is made abundantly clear in Schedule 1 of the Dunny Affidavit which states that numerous checklist items "are available to [MFS, TCG, and Brooks Fiber] only via the MFN clauses" in their agreement.<sup>7</sup> Such checklist items include, among other things, OSS, unbundled transport, and local and tandem switching.<sup>8</sup> Consequently, by Ameritech's own admission, it cannot meet the competitive checklist without the AT&T Agreement. Thus, should the AT&T Agreement be stricken from this proceeding, the Commission must also dismiss Ameritech's

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<sup>7</sup> See Schedule 1 at cover page, attached as exhibit 1 to this filing ("For MFS, Brooks Fiber, and TCG items which are available only via the MFN clause are those for which no entry is found in column 3 for the company in question").

<sup>8</sup> See Schedule 1 at 6, 8-10, attached as exhibit 1 to this filing.

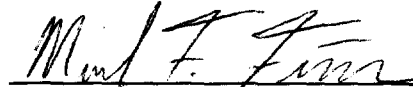
Section 271 application.<sup>9</sup> Ameritech, of course, has the ability to refile its application once it can demonstrate that it has satisfied the competitive checklist.

**CONCLUSION**

For the foregoing reasons, Sprint respectfully asks the Commission to strike all versions of the Ameritech-AT&T Agreement and all references to such agreement from the record in this proceeding and to dismiss summarily Ameritech's Section 271 application.

Respectfully submitted,

**SPRINT COMMUNICATIONS COMPANY, L.P.**



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ITS ATTORNEYS

Dated: February 5, 1997

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<sup>9</sup> In any event, Ameritech should not be allowed to file the third version of its AT&T Agreement with the Commission without the consequence of restarting the 90-day window, thereby permitting the public to have a meaningful opportunity to review and comment upon the proper AT&T Agreement.

# Sprint Exhibit 1

[Schedule 1 to Affidavit of Gregory J. Dunny on Behalf of Ameritech Michigan - Volume 2.1]

## Evaluation of Ameritech's Interconnection Agreements Michigan

The attached matrix provides a "roadmap" to Ameritech's interconnection agreements and the provisions of those agreements that satisfy each requirement of the competitive checklist. The matrix is organized as follows:

**The initial Column** lists, on an item-by-item basis, the requirements that must be met to satisfy the competitive checklist, with citations to the relevant section(s) of the Act and/or the FCC's rules. Columns 1-3 indicate how Ameritech Michigan satisfies each requirement, as explained below.

**Column 1** indicates whether an item is currently offered by Ameritech Michigan in an approved interconnection agreement. Items that are not specifically provided for in the agreements with MFS Intelenet of Michigan, Inc. ("MFS"), Brooks Fiber Communications of Michigan, Inc. ("Brooks Fiber") or TCG Detroit ("TCG") are available on the terms and conditions included in Ameritech Michigan's interconnection agreement with AT&T Communications of Michigan ("AT&T") through the "most favored nation" ("MFN") clauses in the MFS, Brooks Fiber, and TCG agreements. The MFN clause for MFS is § 28.14, for TCG is § 28.13 and for Brooks Fiber is § 28.15. For MFS, Brooks Fiber, and TCG items which are available only via the MFN clause are those for which no entry is found in column 3 for the company in question.

**Column 2** indicates those items that are currently being furnished to and paid for by MFS, Brooks Fiber, and TCG. A "Yes" applies to all three companies unless otherwise indicated. AT&T is not currently furnished with any checklist items.

**Column 3** indicates the sections and schedules in the AT&T, MFS, Brooks Fiber, and TCG agreements that satisfy the requirements of the competitive checklist and the FCC's Rules regarding those items.

**Evaluation of Ameritech's Interconnection Agreements  
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
<b>I. Interconnection (Checklist Item (i))</b>	Yes	Yes	AT&T Art. III	Brooks § 4.0	MFS §§ 4.0	TCG § 4.0
A. Transmission and routing of exchange and exchange access service (Act, § 251(c)(2)(A))	Yes	Yes	AT&T Arts. IV, V	Brooks §§ 5.0, 6.0	MFS §§ 5.0, 6.0	TCG §§ 5.0, 6.0
B. At any technically feasible point (Act, § 251(c)(2)(B))	Yes	Yes	AT&T § 3.2	Brooks § 4.2.1	MFS § 4.1	TCG §§ 4.1, 4.2
1. Line side of local switch (47 CFR § 51.305(a)(2))	Yes		AT&T § 3.2.2			
2. Trunk side of local switch ( <i>Id.</i> )	Yes	Yes	AT&T § 3.2.2			
3. Trunk connection points of a tandem ( <i>Id.</i> )	Yes	Yes	AT&T § 3.2.2			
4. Central office cross connect points ( <i>Id.</i> )	Yes		AT&T § 3.2.2			
5. Out-of-band signaling transfer points necessary to exchange traffic and access call related databases ( <i>Id.</i> )	Yes		AT&T § 3.2.2			
6. Points of access to unbundled network elements ( <i>Id.</i> )	Yes	Yes	AT&T § 3.2.2			
C. Access that is equal in quality to what Ameritech provides itself or any subsidiary, affiliate, or other party (Act, § 251(a)(2)(C))	Yes	Yes	AT&T §§ 3.6, 3.8, Sch. 3.8	Brooks § 4.2.1	MFS § 4.1	TCG § 4.2
1. That meets the same technical criteria and standards used in Ameritech's network (47 CFR § 51.305(a)(3))	Yes	Yes	AT&T § 3.6			TCG § 4.2
2. Upon request, that is superior or inferior to access provided to other carriers (47 CFR § 51.305(a)(4))	Yes		AT&T § 3.6			TCG § 4.2



**Evaluation of Ameritech's Interconnection Agreements  
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
D. On rates, terms, and conditions that are just, reasonable, and nondiscriminatory and are no less favorable than the terms and conditions Ameritech applies to itself (Act, §§ 251(c)(2)(D), 252(d)(1), 47 CFR § 51.305(a)(5))	Yes	Yes	AT&T § 3.6, AT&T Pricing Sch., Item VIII	Brooks § 4.2.1	MFS § 4.1	TCG § 4.2
E. Two-way trunking upon request and as technically feasible (47 CFR § 51.305(f))	Yes		AT&T § 4.3	Brooks §§ 5.3, 6.2	MFS §§ 5.3, 6.2	TCG §§ 5.2, 6.2
F. Through any interconnection method to which the parties may agree, consistent with the Act (47 CFR § 51.321(a))	Yes		AT&T § 3.2.2	Brooks § 4.2.2		TCG § 4.2.2
1. Physical collocation (Act, § 251(c)(6); 47 CFR § 51.321(b)(1))	Yes		AT&T § 12.1	Brooks §§ 4.2.2, 12.0	MFS § 12.1	TCG § 12.1
2. Virtual collocation (Act, § 251(c)(6); 47 CFR § 51.321(b)(2))	Yes	Yes	AT&T §§ 12.2, 12.3, Sch. 12.12	Brooks §§ 12.1, 12.3, 12.4	MFS §§ 12.1, 12.3, 12.4	TCG §§ 12.1, 12.3, 12.4
a. For any type of equipment used for interconnection or access to unbundled network elements, including optical terminating equipment and multiplexers and equipment being collocated to terminate basic transmission facilities (47 CFR § 51.323(b))	Yes	Yes	AT&T §§ 12.1, 12.5			TCG § 12.5
b. Allow requesting carrier to connect collocated equipment to Ameritech's unbundled network elements (47 CFR § 51.323(g))	Yes	Yes	AT&T §§ 12.1, 12.5			TCG §§ 12.1, 12.5
c. Permit two collocating carriers to interconnect equipment at Ameritech's premises (47 CFR § 51.323(h))	Yes	Yes	AT&T §§ 12.1, 12.5			TCG § 12.7

**Evaluation of Ameritech's Interconnection Agreements  
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
d. For physical or virtual collocation, physically accessible interconnection points in accordance with 47 CFR § 51.323(d))	Yes	Yes	AT&T § 12.8.1, Sch. 12.2			
e. Ameritech shall install, maintain and repair collocated equipment in same manner as its own equipment (47 CFR § 51.323(e))	Yes	Yes	AT&T § 12.4			
f. Allocate space in accordance with 47 CFR § 51.323(f)	Yes		AT&T § 12.9, Sch. 12.9.1			
3. Meet point arrangements (47 CFR § 51.321(b)(2))	Yes		AT&T § 3.3	Brooks § 4.3	MFS § 4.2	TCG § 4.3
G. Provide technical information regarding Ameritech's facilities to allow requesting carrier to achieve interconnection (47 CFR § 51.305(f))	Yes	Yes	AT&T § 3.7	Brooks § 4.5	MFS § 4.4	TCG § 4.5
<b>II. Unbundled Network Elements</b>	Yes	Yes	AT&T Art. IX	Brooks § 9.0	MFS § 9.0	TCG § 9.0
A. Provide to any requesting carrier, nondiscriminatory access to network elements (Act, § 251(c)(3))	Yes	Yes	AT&T §§ 9.1.1, 9.4, 9.5	Brooks § 9.0		
1. At any technically feasible point (47 CFR § 51.307(a))	Yes	Yes	AT&T § 9.1.1	Brooks § 9.0		TCG § 9.0
2. On rates, terms, and conditions that are just, reasonable, and nondiscriminatory ( <i>Id.</i> )	Yes	Yes	AT&T §§ 9.4, 9.5	Brooks § 9.0		
3. Provide technical information regarding Ameritech's facilities to enable requesting carrier to achieve access to elements (47 CFR 51.307(c))	Yes	Yes	AT&T §§ 9.4, 9.5, Sch. 9.5, § 1.0	Brooks § 9.1		
B. Provide network elements in a manner that allows requesting carrier to provide any telecommunications service that may be offered by means of that element (47 CFR § 51.307(c))	Yes	Yes	AT&T § 9.1.1	Brooks § 9.0		TCG § 9.5

**Evaluation of Ameritech's Interconnection Agreements  
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
C. Access to the facility or functionality of a network element provided separately from access to other elements, and for a separate charge (47 CFR § 51.307(d))	Yes	Yes	AT&T §§ 9.2, 9.3.2			TCG § 9.5
D. No limitations, restrictions, or requirements on requests for or use of unbundled network elements that would impair a requesting carrier's ability to provide a telecommunications service in the manner it intends (47 CFR § 51.309(a))	Yes	Yes	AT&T § 9.1.1			
E. A requesting carrier may purchase an unbundled network element to provide exchange access services to itself (47 CFR § 51.309(b))	Yes		AT&T §§ 9.1.1, 9.3.1, 9.3.3			
F. A requesting carrier is entitled to exclusive use of an unbundled network facility for a period of time, and to use of an unbundled feature, function, or capability for a period of time (47 CFR § 51.309(c))	Yes	Yes	AT&T §§ 9.1.1, 9.3.1, 9.3.3			
G. Ameritech retains duty to maintain, repair, or replace the unbundled network element ( <u>Id.</u> )	Yes	Yes	AT&T § 9.9			
H. Where technically feasible, quality of the unbundled element itself and access to the element must be at least equal in quality to what Ameritech provides itself or any subsidiary, affiliate, or other party (47 CFR § 51.311(a),(b); 47 CFR § 51.313(a), (b))	Yes	Yes	AT&T §§ 9.4, 9.6, 9.10, Sch. 9.10			
I. Requesting carrier also may obtain service that is superior or inferior to what Ameritech provides itself, upon request (47 CFR § 51.311(c))	Yes		AT&T § 9.6			

**Evaluation of Ameritech's Interconnection Agreements  
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
J. All required OSS functions made available to purchasers of unbundled elements (47 CFR § 51.313(c))	Yes	Yes	AT&T § 9.5.2			
K. Pricing in accord with § 252(d)(1)	Yes	Yes	AT&T Pricing Sch., Item V	Brooks Pricing Sch., Item IV	MFS Pricing Sch., Item IV	TCG Pricing Sch., Item IV
<b>Combinations of Unbundled Elements (47 CFR § 51.315)</b>						
A. Unbundled elements provided in a manner that allows requesting carriers to combine such elements to provide a telecommunications service (47 CFR § 51.315(a))	Yes		AT&T § 9.3	Brooks §§ 9.0, 9.5.2	MFS § 9.5.2	TCG § 9.5.2
B. Requested network elements that Ameritech currently combines will only be separated upon request (47 CFR § 51.315(b))	Yes		AT&T § 9.3.2			
C. Ameritech will perform functions necessary to combine requested network elements where technically feasible and where such combination will not impair the ability of other carriers to access unbundled elements or interconnect with Ameritech (47 CFR § 51.315(c))	Yes		AT&T § 9.3.3			
D. Ameritech will combine network elements with elements possessed by requesting carrier, where technically feasible (47 CFR § 51.315(d))	Yes		AT&T §§ 9.3.6, 9.6			

**Evaluation of Ameritech's Interconnection Agreements  
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
Network Interface Device (NID) (47 CFR § 51.319(b))						
Requesting carrier can connect its local loops to customer's inside wiring through Ameritech's NID and an adjoining NID deployed by requesting carrier ( <u>Id.</u> )	Yes	Yes (MFS, Brooks)	AT&T Schs. 9.2.2 & 9.5, § 3.1			
Operations Support Systems Functions (47 CFR § 51.319(f))						
A. Pre-ordering and provisioning ( <u>Id.</u> )	Yes	Yes	AT&T §§ 9.2.6, 9.5.2, 10.13.2, Sch. 9.2.6			
B. Ordering ( <u>Id.</u> )	Yes	Yes	AT&T §§ 9.2.6, 9.5.2, 10.13.2, Sch. 9.2.6			
C. Maintenance and repair ( <u>Id.</u> )	Yes	Yes	AT&T §§ 9.2.6, 9.5.2, 10.13.2, Sch. 9.2.6			
D. Billing ( <u>Id.</u> )	Yes	Yes	AT&T §§ 9.2.6, 9.5.2, 10.16, Sch. 9.2.6			
E. OSS functions made available by January 1, 1997 ( <u>Id.</u> )	Yes	Yes	AT&T §§ 9.2.6, 9.5.2, Sch. 9.2.6			

**Evaluation of Ameritech's Interconnection Agreements  
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
Operator Services and Directory Assistance (47 CFR § 51.319(g))						
A. Operator services facilities ( <u>Id.</u> )	Yes	Yes	AT&T Sch. 9.2.7, § 1.0	Brooks § 18.0	MFS § 18.0	
B. Directory assistance facilities ( <u>Id.</u> )	Yes	Yes	AT&T Sch. 9.2.7, § 2.0	Brooks § 18.0	MFS § 18.0	
C. Access provided where technically feasible ( <u>Id.</u> )	Yes	Yes	AT&T § 9.1.1	Brooks § 18.0	MFS § 18.0	
Further Unbundling (47 CFR § 51.317)	Yes		AT&T Sch. 2.2	Brooks Ex. A	MFS Ex. A	TCG Ex. A
III. Poles, Ducts, Conduits and Rights-of-Way (Checklist Item (iii))	Yes	Yes (Brooks)	AT&T Art. XVI	Brooks § 15.0	MFS § 15.0	TCG § 16.0
A. Provide nondiscriminatory access on same basis as provided to Ameritech, its affiliates, or any other person at just and reasonable rates in accordance with the requirements of § 224	Yes	Yes	AT&T § 16.1	Brooks § 15.0	MFS § 15.0	TCG § 16.0
B. Costs of modifying Structure allocated in accordance with 47 CFR § 1.1416	Yes		AT&T § 16.3			
C. Provided at just and reasonable rates in accordance with Section 224 (Act, § 271(c)(2)(B)(iii))	Yes	Yes	AT&T § 16.18, AT&T Pricing Sch., PS-VII			

**Evaluation of Ameritech's Interconnection Agreements  
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
<b>IV. Unbundled Loops (Checklist item (iv))</b>	Yes	Yes (MFS, Brooks)	AT&T Sch. 9.2.1	Brooks § 9.0	MFS § 9.0	TCG § 9.0
A. Transmission facility between an MDF or equivalent facility in Ameritech's central office and end-user premises (47 CFR § 51.319(a))	Yes	Yes (MFS, Brooks)	AT&T Sch. 9.2.1	Brooks § 9.0	MFS § 9.1	TCG § 9.1
B. Price based on flat rate (47 CFR § 51.509(a))	Yes	Yes (MFS, Brooks)	AT&T Pricing Sch., Item V	Brooks Pricing Sch., Item IV	MFS Pricing Sch., Item IV	TCG Pricing Sch., Item V
<b>V. Unbundled Transport (Checklist Item (v))</b>	Yes	Yes	AT&T Art. IX			
A. Dedicated transport or entrance facilities or shared transport facilities providing telecommunications service between wire centers or switches owned by Ameritech or requesting carrier (47 CFR § 51.319(d)(1), (d)(2)(i))	Yes	Yes	AT&T Schs. 9.2.4, §§ 1.1-1.3 & 9.5, § 5.1			
B. From trunk side of switch unbundled from switching or other services (Act, § 271(c)(2)(B)(v))	Yes	Yes	AT&T § 9.2.4			
C. Provide all technically feasible transmission facilities, features, functions, and capabilities that requesting carrier could use to provide telecommunications service (47 CFR § 51.319(d)(2)(ii))	Yes	Yes	AT&T Sch. 9.5, § 5.2			
D. Permit, as technically feasible, requesting carrier to connect interoffice facilities to equipment it designates, including its collocated facilities (47 CFR § 51.319(d)(2)(iii))	Yes	Yes	AT&T Sch. 9.5, § 5.3			
E. Permit requesting carrier to obtain functionality of Ameritech's DCS systems in same manner as interexchange carriers (47 CFR § 51.319(d)(2)(iv))	Yes	Yes	AT&T Sch. 9.5, § 5.4			

**Evaluation of Ameritech's Interconnection Agreements  
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
F. Flat-rated charge for dedicated transmission links (47 CFR § 51.509(c))	Yes	Yes	AT&T Pricing Sch., Art. V			
G. Rates for shared transmission facilities between tandem and end-office based on manner in which costs are incurred (47 CFR § 51.509(d))	Yes	Yes	AT&T Pricing Sch., Art. V			
<b>VI. Local and Tandem Switching</b>	Yes		AT&T Art. IX and Schs. 9.2.3 & 9.5			
A. Local switching capability (47 CFR § 51.319(c)(1))	Yes		AT&T Schs. 9.2.3 & 9.5, § 4.0			
1. Line-side facilities ( <u>Id.</u> )	Yes		AT&T Sch. 9.2.3, § 1.0			
2. Trunk-side facilities ( <u>Id.</u> )	Yes		AT&T Sch. 9.2.3, § 1.0			
3. All features, functions and capabilities of the switch ( <u>id.</u> ) including:	Yes		AT&T Sch. 9.2.3, § 1.0			
a. Basic switching function and capabilities ( <u>Id.</u> )	Yes		AT&T Schs. 9.2.3, § 1.0 & 9.5, § 4.1.2			
b. All other features switch is capable of providing, including custom calling, CLASS, Centrex, and any technically feasible customized routing functions ( <u>Id.</u> )	Yes		AT&T Schs. 9.2.3, § 1.0 & 9.5, §§ 4.1.3-4.1.6			



**Evaluation of Ameritech's Interconnection Agreements  
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
4. Ameritech will transfer customer's local service in same interval it transfers customer's interexchange carrier, if transfer requires only a software change (47 CFR 51.319(c)(ii))	Yes		AT&T Schs. 9.2.3, § 1.0, 9.5, § 4.2			
5. Price based on flat rate for line ports and flat rate or per-minute usage charge for switching matrix and trunk ports (47 CFR § 51.509(b))	Yes		AT&T Pricing Sch., Item V			
B. Tandem switching capability (47 CFR § 51.319(c)(2))	Yes		AT&T Schs. 9.2.3, § 2.0 & 9.5, § 4.3			
1. Trunk-connect facilities ( <u>Id.</u> )	Yes		AT&T Sch. 9.2.3, § 2.0			
2. Trunk to trunk switching function ( <u>Id.</u> )	Yes		AT&T Sch. 9.2.3, § 2.0			
3. Functions centralized in tandem switches, including call recording, routing to operator services, and signalling conversion features ( <u>Id.</u> )	Yes		AT&T Sch. 9.2.3, § 2.4			
C. Costs recovered via usage-sensitive charges or in other manner consistent with how they are incurred (47 CFR § 51.509(e))	Yes		AT&T Pricing Sch., Item V			
<b>VII. Nondiscriminatory Access to 911 and E911 services; directory assistance services to allow other carrier's customers to obtain telephone numbers; and operator call completion services (Checklist item (vii))</b>	Yes	Yes	AT&T §§ 3.9, 10.12.4, Sch. 9.2.7	Brooks § 18.0	MFS § 18.0	
911 and E911 services	Yes	Yes	AT&T §§ 3.9, 10.12.4	Brooks § 18.0	MFS § 18.0	

**Evaluation of Ameritech's Interconnection Agreements  
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
Operator Call Completion Services						
A. Available on same rates, terms and conditions to all carriers (47 CFR § 51.217(b))	Yes	Yes	AT&T § 9.4, AT&T Pricing Sch., Item V			
B. Requesting carrier may obtain access at least equal in quality to that of the providing LEC (47 CFR § 51.217(a)(2))	Yes	Yes	AT&T § 9.4			
C. Accessible by dialing 0 or 0+, regardless of local service provider (47 CFR § 51.217(c)(2))	Yes	Yes	AT&T Sch. 9.2.7			
D. No unreasonable dialing delays (47 CFR § 51.217(b))	Yes	Yes	AT&T Art. XIV, Sch. 9.2.7	Brooks § 14.0	MFS § 14.0	TCG § 14.0
Directory Assistance Services						
A. Available on same rates, terms, and conditions to all carriers (47 CFR § 51.217(b))	Yes	Yes (Brooks, MFS)	AT&T § 9.4, AT&T Pricing Sch., Item V	Brooks § 18.0	MFS § 18.0	
B. Requesting carrier may obtain access at least equal in quality to that of Ameritech (47 CFR § 51.217(a)(2))	Yes	Yes (Brooks, MFS)	AT&T § 9.4	Brooks § 18.0	MFS § 18.0	
C. Any customer of competing provider can obtain directory listings, except unlisted numbers, for customers of any carrier on a nondiscriminatory basis (47 CFR § 51.217(c)(3)(i))	Yes	Yes (Brooks, MFS)	AT&T § 9.4, Sch. 9.2.7, § 2.4	Brooks § 18.0	MFS § 18.0	
D. No unreasonable dialing delays (47 CFR § 51.217(b))	Yes	Yes (Brooks, MFS)	AT&T Art. XIV, Sch. 9.2.7	Brooks §§ 14.0, 18.0	MFS § 14.0	TCG § 14.0

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E. Directory listings provided to competing provider in readily accessible magnetic tape or electronic formats in timely fashion (47 CFR § 51.217(c)(3)(ii))	Yes	Yes	AT&T Schs. 9.2.7, § 2.4 & 9.5, §§ 8.10, 8.11	Brooks § 18.0	MFS § 18.0	
F. Competing providers have access to and may read information in Ameritech's directory assistance databases ( <u>Id.</u> )	Yes	Yes (Brooks, MFS)	AT&T Sch. 9.2.7, § 2.4	Brooks § 18.0	MFS § 18.0	
G. Access to adjunct features (e.g., rating tables or customer information databases) necessary to allow competing providers full use of operator and directory assistance services (47 CFR § 51.217(d))	Yes	Yes (Brooks, MFS)	AT&T Sch. 9.2.7, § 2.4	Brooks § 18.0	MFS § 18.0	
H. Branding of Operator Services and Directory Assistance Services (47 CFR § 51.217(d))	Yes		AT&T Schs. 9.2.7, § 2.2, 9.5, §§ 8.14, 8.15	Brooks § 18.0	MFS § 18.0	
<b>VIII. White Pages Directory Listings (Checklist item (viii))</b>	Yes	Yes	AT&T Art. XV	Brooks § 18.0	MFS § 18.0	TCG § 15.0
White Pages directory listing for customers of other carrier's local exchange service (Act, § 271(c)(2)(B)(viii))	Yes	Yes	AT&T § 15.1	Brooks § 18.0	MFS § 18.0	TCG § 15.1
<b>IX. Access to Telephone Numbers (Checklist item (ix))</b>	Yes	Yes	AT&T Art. XIV	Brooks § 14.0	MFS § 14.0	TCG § 14.0
A. Nondiscriminatory access until the date numbering administration guidelines, plan or rules are established (47 CFR § 51.217(a)(2))	Yes	Yes	AT&T Art. XIV & § 19.14	Brooks § 14.0	MFS § 14.0	
B. After that date, compliance with such guidelines, plan or rules (Act, § 271(c)(2)(B)(ix))	Yes	Yes	AT&T Art. XIV	Brooks § 14.0	MFS § 14.0	

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C. Access at least equal to what Ameritech provides itself (47 CFR § 51.217(c)(1))	Yes	Yes	AT&T Art. XIV	Brooks § 14.0	MFS § 14.0	
<b>X. Access to Signaling and Call-related Databases</b> (Checklist item (x))	Yes	Yes	AT&T Art. IX, Schs. 9.2.5 & 9.5	Brooks § 16.0	MFS § 16.0	TCG § 17.0
A. Signaling Networks (47 CFR § 51.319(e)(1))	Yes		AT&T § 9.2.5, Sch. 9.2.5	Brooks § 16.0	MFS § 16.0	TCG § 17.0
1. Signaling links ( <u>Id.</u> )	Yes		AT&T § 9.2.5, Sch. 9.2.5, §§ 1.0, 1.2			
2. Signaling transfer points ( <u>Id.</u> )	Yes		AT&T § 9.2.5, Sch. 9.2.5, § 1.0			
3. For carriers purchasing unbundling switching capability, access to Ameritech's signaling network in same manner as Ameritech ( <u>Id.</u> )	Yes		AT&T Sch. 9.5, § 6.1.1			
4. For requesting carriers with their own switching facilities, access to Ameritech's signaling for each of carrier's switches in same manner as Ameritech connects its switches to an STP or in any other technically feasible manner ( <u>Id.</u> )	Yes		AT&T Sch. 9.5, § 6.1.2			
B. Call-related Databases (47 CFR § 51.319(e)(2))	Yes		AT&T Sch. 9.2.5, § 2.0	Brooks § 16.0	MFS § 16.0	TCG § 17.0
1. Line information database ( <u>Id.</u> )	Yes		AT&T Sch. 9.2.5, § 2.2 & 9.5, § 6.2.1			

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2. Toll-free calling database ( <u>Id.</u> )	Yes		AT&T Schs. 9.2.5, § 2.1 & 9.5, § 6.2.1			
3. Downstream number portability database ( <u>Id.</u> )	Yes		AT&T Schs. 9.2.5, § 2.4 & 9.5, § 6.2.1			
4. AIN databases ( <u>Id.</u> )	Yes		AT&T Schs. 9.2.5, § 2.5 & 9.5, § 6.2.1			
a. Physical access at the STP linked to the unbundled database ( <u>Id.</u> )	Yes		AT&T Sch. 9.2.5			
b. Carriers purchasing local switching capability may access Ameritech's service control point in same manner as Ameritech ( <u>Id.</u> )	Yes		AT&T Sch. 9.5, § 6.2.2			
c. Carrier deploying own switch given access to Ameritech's service control point in manner allowing carrier to provide any call-related, database-supported services ( <u>Id.</u> )	Yes		AT&T Sch. 9.2.5			
d. Access to call-related databases complies with § 222 of the Act ( <u>Id.</u> )	Yes		AT&T Sch. 9.5, § 6.2.2			
C. Service Management Systems (47 CFR § 51.319(e)(3))	Yes		AT&T Sch. 9.5, § 6.0	Brooks § 16.0	MFS § 16.0	TCG § 17.0
1. Sends information and call processing instructions to service control point and provides requesting carriers with call-processing capabilities ( <u>Id.</u> )	Yes		AT&T Sch. 9.5, § 6.3			

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			AT&T	Brooks Fiber	MFS	TCG
2. Requesting carrier given information necessary to enter correctly, or format for entry, information for input into SMS ( <u>Id.</u> )	Yes		AT&T Sch. 9.5, § 6.3.1			
3. Requesting carrier allowed same access as Ameritech to develop AIN-based services via SMS ( <u>Id.</u> )	Yes		AT&T Sch. 9.5, § 6.3.2			
4. Access to SMS complies with § 222 of the Act ( <u>Id.</u> )	Yes		AT&T Sch. 9.5, § 6.3.3			
5. Costs of call-related database and signaling service is usage sensitive, though the cost of dedicated circuits known as signaling links is flat-rated (47 CFR § 51.509(f))	Yes		AT&T Pricing Sch., Item V			
<b>XI. Number Portability (Checklist item (xi))</b>	Yes	Yes	AT&T Art. XIII	Brooks § 13.0	MFS § 13.0	TCG § 13.0
A. Provide interim number portability through RCF, DID or other comparable arrangements (Act, § 271(c)(2)(B)(xi))	Yes	Yes	AT&T §§ 13.1-3	Brooks §§ 13.1-4	MFS §§ 13.1-4	TCG §§ 13.1-3
B. Any other comparable and technically feasible method upon request (47 CFR § 52.7(a))	Yes	Yes	AT&T § 13.10			TCG § 13.1
C. Competitively neutral cost recovery mechanism (47 CFR § 42.9)	Yes	Yes	AT&T § 13.8	Brooks § 13.6	MFS § 13.5	TCG §§ 13.5, 13.7
D. After regulations are issued, full compliance with performance criteria and schedules for implementation of long-term database method (47 CFR § 42.3(a), (b))	Yes	Yes	AT&T § 13.9	Brooks § 13.1	MFS § 13.1	
<b>XII. Local Dialing Parity (Checklist item (xii))</b>	Yes	Yes	AT&T Art. XII	Brooks § 14.0	MFS § 14.0	TCG § 14.0

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			AT&T	Brooks Fiber	MFS	TCG
A. Provide requesting carriers with information necessary to implement local dialing parity in accordance with § 251(c)(3)	Yes	Yes	AT&T Art. XIV	Brooks § 14.0	MFS § 14.0	TCG § 14.0
B. Nondiscriminatory access to telephone numbers, operator services, directory assistance and directory listings with no unreasonable dialing delays (Act, § 251(c)(3))	Yes	Yes	AT&T Schs. 9.2.7 & 9.5, § 8.0	Brooks § 14.0	MFS § 14.0	TCG § 14.0
<b>XIII. Reciprocal Compensation (Checklist item (xiii))</b>	Yes	Yes	AT&T § 4.7	Brooks § 5.0	MFS § 5.0	TCG § 5.0
A. Reciprocal compensation arrangements in accord with Act § 252(d)(2)	Yes	Yes	AT&T § 4.7	Brooks § 5.7	MFS § 5.8	TCG § 5.6
1. No charge for local traffic by party on whose network call originates (47 CFR § 51.703(b))	Yes	Yes	AT&T § 4.7.1	Brooks § 5.7	MFS § 5.8.1	TCG § 5.6.1
<b>XIV. Resale (Checklist item (xiv))</b>	Yes	Yes (MFS)	AT&T Art. X	Brooks § 10.0	MFS § 10.0	TCG § 10.0
A. Provide at wholesale rates any telecommunications service provided at retail to subscribers who are not telecommunications carriers (Act, § 251(c)(4)(A))	Yes	Yes (MFS)	AT&T § 10.1	Brooks § 10.0	MFS § 10.1	TCG § 10.1
B. No unreasonable or discriminatory conditions or limitations (Act, § 251(c)(4)(B))	Yes	Yes (MFS)	AT&T § 10.1	Brooks §§ 10.1, 10.2	MFS §§ 10.1, 10.2	TCG § 10.1
C. Services are equal in quality, subject to same conditions, and within same provisioning time intervals provided to other carriers and to end users (47 CFR § 51.603(b))	Yes	Yes (MFS)	AT&T § 10.9; Sch. 10.9.2, 10.9.6			

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D. Price in accord with § 252(d)(3)	Yes	Yes (MFS)	AT&T Pricing Sch., Item VII, and wholesale tariff based on Illinois Resale Order.			

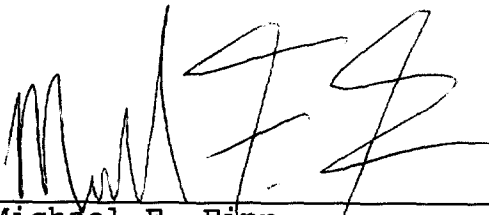


CERTIFICATE OF SERVICE

I hereby certify that, on 5 February 1997, copies of the foregoing "Comments of Sprint Communications Company, L.P., in support of Motion filed by the Association for Local Telecommunications Services were served by first class mail, postage prepaid upon the following:

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